

REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

EARL WALLACE,

Defendant.

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Criminal Action No. 07-26-SLR

MOTION FOR MODIFICATION OF RESIDENCE

Defendant, Earl Wallace, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court for an order modifying his place of residence. In support of the motion, the defense submits as follows:

1. On February 28, 2007, Mr. Wallace was ordered by Magistrate Judge Mary Pat Thyng to reside with his sister, Michelle Wallace, at [REDACTED] Baltimore, MD, as a condition of his pre-trial release.

2. Mr. Wallace now wishes to change his residence and reside at [REDACTED]
[REDACTED], Baltimore, MD, [REDACTED]

3. Mr. Wallace's District of Delaware U.S. Pre-trial Services Officer, Carol Sain, has no objection to Mr. Wallace's request for a change of residence. Mr. Wallace is currently being supervised by the Baltimore Pre-trial Services Office. Defense counsel has been informed by USPO Carol Sain that Mr. Wallace's Baltimore supervising U.S. Probation Officer, Susanna Merchant, also

has no objection to Mr. Wallace's request for a change of residence to the address stated in this motion.

4. Shannon Thee Hanson, the attorney handling this case for the government, is out of the office until April 2, 2007, and defense counsel was unable to speak with her to ascertain the government's position on this motion.

WHEREFORE, Mr. Wallace respectfully requests that the Court sign the attached Order for Modification of Residence.

Respectfully Submitted,

/s/
Eleni Kousoulis, Esquire
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
(302) 573-6010
ecf_de@msn.com
Attorney for Defendant Earl Wallace

DATED: March 30, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 07-26-SLR
	:	
EARL WALLACE,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

The undersigned attorney for Defendant Earl Wallace hereby certifies that on March 30, 2007, two (2) copies of the attached Motion for Modification were placed in a box in the United States District Court of the District of Delaware addressed to the following person(s):

CAROL SAIN, USPO
U.S. Probation and Pre-trial Services
Suite 400, 824 Market Street
Wilmington, DE 19801

/s/ _____
ELENI KOUSOULIS, ESQUIRE
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Defendant Earl Wallace

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

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Criminal Action No. 07-26-SLR

ORDER

In response to Mr. Wallace's Motion for Modification of Residence, it is HEREBY ORDERED on this _____ day of _____, 2007, that Defendant Earl Wallace be permitted to change his residence to _____ Baltimore, MD,

The Honorable Sue L. Robinson
United States District Judge